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6 | Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

**10 | BOARDS OF TRUSTEES OF THE SHEET
11 | METAL WORKERS LOCAL 104 HEALTH
CARE TRUST, et al.,**

12 Plaintiffs,

13 |

14 JET MECHANICAL, INC., a California corporation.

Defendant.

| Case No.: C13-4194 EMC

**PLAINTIFFS' REQUEST TO VACATE
CASE MANAGEMENT CONFERENCE;
and [PROPOSED] ORDER THEREON**

Date: January 22, 2015

Time: 10:30 a.m.

Ctrm: Courtroom 5, 17th Floor
450 Golden Gate Avenue
San Francisco, California

Judge: The Honorable Edward M. Chen

18 Plaintiffs respectfully request that the Case Management Conference scheduled for
19 January 22, 2015, at 10:30 a.m., be vacated. Good cause exists, as follows.

20 1. As the Court's records will reflect, this action was filed on September 10, 2013 to
21 compel Defendant to comply with the terms of its Collective Bargaining Agreement.

22 2. The parties have executed a Judgment Pursuant to Stipulation, which is being filed
23 by Plaintiffs concurrently with this request. Entry of the Judgment Pursuant to Stipulation is
24 pending an Order by the Honorable Judge Edward M. Chen.

25 3. There are no issues that need to be addressed by this Court at the currently
26 scheduled Case Management Conference. As the parties have resolved this matter, and in the
27 interest of conserving costs as well as the Court's time and resources, Plaintiffs respectfully
28 request that the Court vacate the currently scheduled Case Management Conference.

1 4. Plaintiffs recognize that a case management conference statement is due seven days
2 in advance of the case management conference date, pursuant to Local Rule 16-9. Should this
3 Court require Plaintiffs to file a complete Case Management Conference Statement, Plaintiffs will
4 do so promptly.

Dated: January 15, 2015

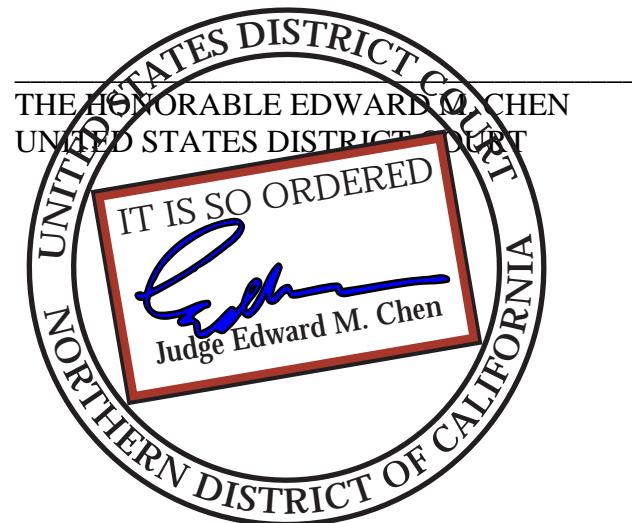
**SALTZMAN & JOHNSON
LAW CORPORATION**

By: Michele R. Stafford /S/
Attorneys for Plaintiff

10 | IT IS SO ORDERED.

11 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Case
12 Management Conference is hereby VACATED.

13 Date: 1/15/15



1 **PROOF OF SERVICE**

2 I, the undersigned, declare:

3 1. I am a citizen of the United States and am employed in the County of San
4 Francisco, State of California. My business address is 44 Montgomery Street, Suite 2110, San
5 Francisco, California 94104.

6 2. I am over the age of eighteen and not a party to this action.

7 3. On **January 15, 2015**, I served the following document(s):

8 **PLAINTIFFS' REQUEST TO VACATE CASE MANAGEMENT CONFERENCE; and**

9 **[PROPOSED] ORDER THEREON**

10 on the interested parties in said action by enclosing a true and exact copy of each document in a
11 sealed envelope and placing the envelope for collection and First Class mailing following our
12 ordinary business practices. I am readily familiar with this business' practice for collecting and
13 processing correspondence for mailing. On the same day that correspondence is placed for
14 collection and mailing, it is deposited in the ordinary course of business with the United States
15 Postal Service in a sealed envelope with postage fully prepaid.

16 4. The envelopes were addressed and mailed as follows:

17
18 **Jet Mechanical, Inc.**
19 **c/o Martin John Flaton, Jr.**
809 Aldo Ave., Suite 105
Santa Clara, CA 95054

20 I declare under penalty of perjury that the foregoing is true and correct and that this
21 declaration was executed on **January 15, 2015**, at San Francisco, California.

22 /S/
23

24
25
26
27
28 Alicia Rutkowski
Paralegal